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March 25, 2024

VIA ECF

The Hon. Jennifer H. Rearden
Daniel Patrick Moynihan
United States Courthouse - Courtroom 12B
500 Pearl St.
New York, NY 10007-1312

Application GRANTED. Defendant shall respond to the Complaint by **Friday**, **April 29**, **2024**. The Clerk of Court is directed to terminate ECF No. 7. SO ORDERED.

Jennifer H. Rearden, U.S.D.J. Dated: March 25, 2024

P. Kearden

Re: <u>Toro v. Thesy, LLC, Case No. 1:24-cv-01285 (S.D.N.Y.)</u>

Dear Judge Rearden:

This Firm represents Defendant Thesy, LLC ("Defendant") in the above-referenced matter. We write, with the consent of Plaintiff Andrew Toro ("Plaintiff"), to respectfully request a 30-day extension of the deadline for Defendant to respond to the Complaint from March 29, 2024 up to and including, April 29, 2024.

By way of background, Plaintiff commenced this action on or about February 21, 2024. (ECF No. 1). We understand that Plaintiff purportedly served Defendant with the Summons and Complaint on March 8, 2024 (ECF No. 5), which would make Defendant's responsive pleading due March 29, 2024.

This is the first request for an extension of this deadline, which, if granted, will not affect any other scheduled litigation dates or deadlines. The Court has not yet scheduled the Initial Pretrial Conference in this action, or set any other deadlines. This request is not intended to cause undue delay, but instead to provide Defendant with time to investigate the allegations in the Complaint in order to provide a response, as well as explore the possibility of a non-litigated resolution of this action. The undersigned has communicated with counsel for Plaintiff, and Plaintiff consents to this request.

We thank the Court for its time and attention to this matter, and for its consideration of this request.



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Respectfully submitted,

SEYFARTH SHAW LLP

John W. Egan

cc: All counsel of record (via ECF)